

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 7

IDEAL MORTGAGE BANKERS, LTD
a/k/a LEND AMERICA,
a/k/a CONSUMER FIRST LENDING KEY

Case No. 810-79280-dte

Debtor.
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**AMENDED NOTICE OF TRUSTEE'S MOTION FOR THE ENTRY OF AN ORDER:
(a) FINDING HELENE DECILLIS, MICHAEL PRIMEAU AND MICHAEL HOWARD
ASHLEY TO BE IN CONTEMPT OF THE COURT'S "ORDER: (i) PURSUANT TO
RULE 9001(5) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE,
DESIGNATING HELENE DECILLIS, MICHAEL PRIMEAU AND MICHAEL HOWARD
ASHLEY, JOINTLY AND SEVERALLY, THE PERSONS RESPONSIBLE FOR
PERFORMING THE OBLIGATIONS OF THE DEBTOR HEREIN UNDER THE
BANKRUPTCY CODE; (ii) DIRECTING HELENE DECILLIS, MICHAEL PRIMEAU
AND MICHAEL HOWARD ASHLEY, JOINTLY AND SEVERALLY, TO LOCATE AND
CAUSE TO BE TURNED OVER TO THE TRUSTEE THE BOOKS, RECORDS, FILES,
AND OTHER DOCUMENTS OF THE DEBTOR, AND TO PROVIDE THE TRUSTEE
WITH SUCH INFORMATION AS IS NECESSARY TO LOCATE AND ADMINISTER
THE PROPERTY OF THE ESTATE"; (b) IMPOSING FINES AND SANCTIONS; AND
(c) DIRECTING THAT HELENE DECILLIS, MICHAEL PRIMEAU AND MICHAEL
HOWARD ASHLEY PAY COSTS AND ATTORNEY'S FEES**

PLEASE TAKE NOTICE, that a hearing will be held on **April 14, 2011, at 10:00
a.m.**, before Judge Dorothy T. Eisenberg, at the United States Bankruptcy Court for the
Eastern District of New York, 290 Federal Plaza, Central Islip, New York 11722, Room
760 (the "Court") on the motion of R. Kenneth Barnard, Esq., the Chapter 7 Trustee of
Ideal Mortgage Bankers, Ltd a/k/a Lend America a/k/a Consumer First Lending Key (the
"Trustee"), seeking the entry of an Order, pursuant to §105(a) of the Bankruptcy Code
and Rules 9020 of the Federal Rules of Bankruptcy Procedure (a) finding Helene Decillis,
Michael Primeau and Michael Howard Ashley to be in contempt of the Court's "Order:

(i) Pursuant to Rule 9001(5) of the Federal Rules of Bankruptcy Procedure, Designating Helene Decillis, Michael Primeau and Michael Howard Ashley, Jointly and Severally, the Persons Responsible for Performing the Obligations of the Debtor Herein under the Bankruptcy Code; (ii) Directing Helene Decillis, Michael Primeau and Michael Howard Ashley, Jointly and Severally, to Locate and Cause to Be Turned over to the Trustee the Books, Records, Files, and Other Documents of the Debtor, and to Provide the Trustee with Such Information as Is Necessary to Locate and Administer the Property of the Estate”, (b) imposing fines and sanctions; and (c) directing that Helene Decillis, Michael Primeau and Michael Howard Ashley pay costs and attorney’s fees, and (d) granting the Trustee such other, further and different relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that objections (“Objections”) to the relief requested in the Motion, if any, must be in writing, conform with the Bankruptcy Code and Rules, state with particularity the grounds therefor and be filed with the Court, with a courtesy copy to the Chambers of the Honorable Dorothy T. Eisenberg, United States Bankruptcy Judge, and served upon, so as to be received by, the Law Offices of R. Kenneth Barnard, the attorneys for the Trustee, no later than **April 7, 2011 at 4:00 p.m.**, as follows: (a) (i) through the Bankruptcy Court's electronic filing system (in accordance with Order No. 473), which may be accessed through the internet at the Bankruptcy Court's website at www.nyeb.uscourts.gov; and (ii) in portable document format (PDF) using Adobe Exchange Software for conversion; or (b) if a party is unavailable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number to which the objection refers and the file name on the outside of the envelope.

An objection filed by a party with no legal representation shall comply with section (b) above.

PLEASE TAKE FURTHER NOTICE, that in the event objections are not timely filed, the Court may grant the relief sought in the Motion.

Dated: Babylon, New York
March 22, 2011

**LAW OFFICES OF
R. KENNETH BARNARD**
Attorneys for the Trustee

By: */s/ R. Kenneth Barnard*
R. Kenneth Barnard
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CERTIFICATION OF SERVICE

The undersigned, certifies that on March 28, 2011, I served a true copy of the annexed:

(i) AMENDED NOTICE OF TRUSTEE'S MOTION FOR THE ENTRY OF AN ORDER: (a) FINDING HELENE DECILLIS, MICHAEL PRIMEAU AND MICHAEL HOWARD ASHLEY TO BE IN CONTEMPT OF THE COURT'S "ORDER: (i) PURSUANT TO RULE 9001(5) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE, DESIGNATING HELENE DECILLIS, MICHAEL PRIMEAU AND MICHAEL HOWARD ASHLEY, JOINTLY AND SEVERALLY, THE PERSONS RESPONSIBLE FOR PERFORMING THE OBLIGATIONS OF THE DEBTOR HEREIN UNDER THE BANKRUPTCY CODE; (ii) DIRECTING HELENE DECILLIS, MICHAEL PRIMEAU AND MICHAEL HOWARD ASHLEY, JOINTLY AND SEVERALLY, TO LOCATE AND CAUSE TO BE TURNED OVER TO THE TRUSTEE THE BOOKS, RECORDS, FILES, AND OTHER DOCUMENTS OF THE DEBTOR, AND TO PROVIDE THE TRUSTEE WITH SUCH INFORMATION AS IS NECESSARY TO LOCATE AND ADMINISTER THE PROPERTY OF THE ESTATE"; (b) IMPOSING FINES AND SANCTIONS; AND (c) DIRECTING THAT HELENE DECILLIS, MICHAEL PRIMEAU AND MICHAEL HOWARD ASHLEY PAY COSTS AND ATTORNEY'S FEES

by regular mail by placing a copy of the same in a sealed envelope, with postage prepaid thereon, and depositing it in an official depository of the U.S. Postal Service within the State of New York, addressed to those entities listed in the service list, annexed hereto.

Dated: March 28, 2011

s/ R. Kenneth Barnard
R. KENNETH BARNARD

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